

08 MAG 0521

ORIGINAL

Approved: _____

PARVIN MOYNE
Assistant United States Attorney

Before: THE HONORABLE MICHAEL H. DOLINGER
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA	:	<u>COMPLAINT</u>
- v. -	:	Violation of
VICTOR MANAURIS GARCIA-	:	21 U.S.C. § 846
LANTIGUA,	:	COUNTY OF OFFENSE:
	:	BRONX
Defendant.	:	
	:	
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SOUTHERN DISTRICT OF NEW YORK, ss.:

CHAD ASSENMACHER, being duly sworn, deposes and says that he is a Special Agent with the United States Drug Enforcement Administration ("DEA") and charges as follows:

COUNT ONE

1. In or about August 2007, in the Southern District of New York and elsewhere, VICTOR MANAURIS GARCIA-LANTIGUA, the defendant, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that VICTOR MANAURIS GARCIA-LANTIGUA, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, five hundred grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Sections 812, 841(a)(1) and 841(b)(1)(B) of Title 21, United States Code.

(Title 21, United States Code, Section 846.)

The bases for deponent's knowledge and for the foregoing charge are, in part, as follows:

3. I have been a Special Agent with the DEA

\$500,000 PRB TO BE CO-SIGNED BY 5 FINANCIALLY RESPONSIBLE PERSON'S; (INCLUDING DEFT'S MOTHER; GRACE MERCEDES, THE AUNT OF GRACE MERCEDES); SECURED BY \$5,000 CASH/PROPERTY; TRAVEL LIMITED TO SDNY; SURRENDER TRAVEL DOCUMENTS (& NO NEW APPLICATIONS); STRICT PRETRIAL SUPERVISION; HOME DETENTION WITH ELECTRONIC MONITORING; DEFT TO BE RELEASED UPON ALL CONDITIONS MUST BE SATISFIED

AO 98 (Rev. 11/07) Appearance Bond

UNITED STATES DISTRICT COURT

Southern

District of

New York

UNITED STATES OF AMERICA
V.

APPEARANCE BOND

VICTOR M. GARCIA-LANTIGUA

Defendant

Case Number: 08 MAG 521

Non-surety: I, the undersigned defendant acknowledge that I and my ...

Surety: We, the undersigned, jointly and severally acknowledge that we and our ... personal representatives, jointly and severally, are bound to pay to the United States of America the sum of

\$ 500,000, and there has been deposited in the Registry of the Court the sum of \$ 5,000 in cash or PROPERTY (describe other security).

The conditions of this bond are that the defendant

VICTOR M. GARCIA-LANTIGUA

Name

is to appear before this court and at such other places as the defendant may be required to appear, in accordance with any and all orders and directions relating to the defendant's appearance in this case, including appearance for violation of a condition of defendant's release as may be ordered or notified by this court or any other United States District Court to which the defendant may be held to answer or the cause transferred. The defendant is to abide by any judgment entered in such matter by surrendering to serve any sentence imposed and obeying any order or direction in connection with such judgment.

It is agreed and understood that this is a continuing bond (including any proceeding on appeal or review), which shall continue until such time as the undersigned are exonerated.

If the defendant appears as ordered or notified and otherwise obeys and performs the foregoing conditions of this bond, then this bond is to be void, but if the defendant fails to obey or perform any of these conditions, payment of the amount of this bond shall be due forthwith. Forfeiture of this bond for any breach of its conditions may be declared by any United States District Court having cognizance of the above entitled matter at the time of such breach and if the bond is forfeited and if the forfeiture is not set aside or remitted, judgment may be entered upon motion in such United States District Court against each debtor jointly and severally for the amount above stated, together with interest and costs, and execution may be issued and payment secured as provided by the Federal Rules of Criminal Procedure and any other laws of the United States.

This bond is signed on

March 12, 2008
Date

at

500 Pearl Street, New York, New York 10007
Place

Defendant

Surety

Surety

Signed and acknowledged before me on

March 12, 2008
Date

Signature of Judge/Clerk

Bond Approved:

Signature of AUSA